

**FILED**

OCT 24 2017

IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF PENNSYLVANIACLERK U.S. DISTRICT COURT  
WEST. DIST. OF PENNSYLVANIA

UNITED STATES OF AMERICA )

v. )

ANDRZEJ KAZIMIERZ ZIELKE )

Criminal No. 17-295

[UNDER SEAL]

(18 U.S.C. § 2, 21 U.S.C. §§ 841(a)(1),  
841(b)(1)(C) and 846)**INDICTMENT****COUNTS ONE THROUGH FIVE**

The grand jury charges:

On or about the dates set forth below, in the Western District of Pennsylvania, defendant ANDRZEJ KAZIMIERZ ZIELKE did knowingly, intentionally and unlawfully dispense and distribute, and cause to be dispensed and distributed, quantities of Morphine Sulfate and Hydrocodone, both of which are Schedule II controlled substances, to an individual known to the grand jury as "J. Z." outside the usual course of professional practice and not for a legitimate medical purpose, each such instance being a separate count of this Indictment.

Count	Date	Individual
1	July 6, 2016	J. Z.
2	July 15, 2016	J. Z.
3	July 28, 2016	J. Z.
4	August 10, 2016	J. Z.
5	August 25, 2016	J. Z.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C) and Title 18, United States Code, Section 2.

**COUNTS SIX AND SEVEN**

The grand jury further charges:

On or about the dates set forth below, in the Western District of Pennsylvania, defendant ANDRZEJ KAZIMIERZ ZIELKE did knowingly, intentionally and unlawfully dispense and distribute, and cause to be dispensed and distributed, quantities of Methadone and Oxycodone, both of which are Schedule II controlled substances, to an individual known to the grand jury as "T.M." outside the usual course of professional practice and not for a legitimate medical purpose, each such instance being a separate count of this Indictment.

Count	Date	Individual
6	October 4, 2017	T.M.
7	October 4, 2017	T.M.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

**COUNTS EIGHT THROUGH THIRTEEN**

The grand jury further charges:

On or about the dates set forth below, in the Western District of Pennsylvania, defendant, ANDRZEJ KAZIMIERZ ZIELKE, did knowingly, intentionally and unlawfully dispense and distribute, and cause to be dispensed and distributed, quantities of Oxycodone, a Schedule II controlled substance, to an individual known to the grand jury as "C.M." outside the usual course of professional practice and not for a legitimate medical purpose, each such instance being a separate count of this Indictment.

Count	Date	Individual
8	October 3, 2017	C.M.
9	September 8, 2017	C.M.
10	August 11, 2017	C.M.
11	July 14, 2017	C.M.
12	June 12, 2017	C.M.
13	May 19, 2017	C.M.

In violation of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C), and Title 18, United States Code, Section 2.

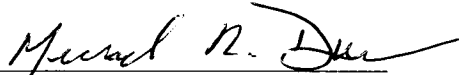
**COUNT FOURTEEN**

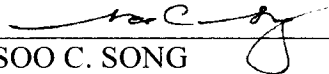
The grand jury further charges:

From in and around March 2016, and continuing thereafter to in and around October of 2017, in the Western District of Pennsylvania, defendant ANDRZEJ KAZIMIERZ ZIELKE did knowingly, intentionally and unlawfully conspire with persons known and unknown to the grand jury to distribute a quantity of Oxycodone, Hydrocodone, Morphine Sulfate and Methadone, Schedule II controlled substances, contrary to the provisions of Title 21, United States Code, Sections 841(a)(1) and 841(b)(1)(C).

In violation of Title 21, United States Code, Section 846.

A True Bill,

  
FOREPERSON

  
SOO C. SONG  
Acting United States Attorney  
DC ID No. 457268